



POLICY DOCUMENT

Group Member: Progress Housing Group

Service Area: Property Services

Document Ref No: GRPOLPS03

Subject Title: Fire Safety Management

Version: 6

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1. INTRODUCTION

- 1.1 Those responsible for buildings can avoid fires by taking responsibility for fire risk management and maintenance and by ensuring occupants adopt the right behaviours and procedures. The Regulatory Reform (Fire Safety) Order 2005 (FSO), the Fire Safety Act 2021 (England and Wales) the Building Safety Act 2022, the Fire Safety (England) Regulations 2022, the Smoke and Carbon Monoxide Alarm (amendment) Regulations 2022 and the Fire (Scotland) Act 2005 (FSA) place a duty on persons responsible for buildings in England, Wales and Scotland to carry out risk assessments and implement adequate fire prevention measures within the premises that they own and/or manage.

2. SCOPE OF THE POLICY

- 2.1 The Group has established a policy which meets the requirements of the current fire safety legislation, codes of practice and good practice guidance. This will provide assurance that arrangements are in place to identify, manage and/or mitigate the risks associated with fire.
- 2.2 The Group will also ensure that compliance with fire safety legislation is formally reported at Senior Leadership Team (SLT) and board level, including the details of any non-compliance and planned corrective actions.
- 2.3 The policy applies to all companies within the Group and therefore is relevant to all Group employees, tenants, contractors and other persons or other stakeholders who may work on, occupy, visit, or use its premises, or who may be affected by its activities or services.
- 2.4 It should be used by all to ensure they understand the obligations placed upon the Group to maintain a safe environment for customers and employees within the homes of each customer, and within all communal areas of buildings and 'other' properties owned and managed by the Group (offices, commercial shops, depots, etc.).

3. RESPONSIBILITY

3.1 Key Roles and Responsibilities

- 3.1.1 In order to ensure that this Fire Safety Management Policy, and the supporting procedure is adhered to, the Group will appoint suitably competent personnel to act as the 'Responsible Person' on behalf of the individual Duty Holder

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and oversee the implementation and review of these documents.

- 3.1.2 **Responsible Person (England) and Duty Holder (Scotland)** – The Director (Property Services) will fulfil the role of the appointed responsible Person/Duty Holder on behalf of the Group in order to ensure the appropriate management of the risks associated with fire safety. As a result, the Director (Property Services) will hold responsibility for the implementation of this document, and supporting procedure, as well as ensuring fire safety compliance is achieved and maintained.
- 3.1.3 Although the organisation has an appointed Duty Holder, the Group’s Chief Executive will be ultimately responsible for ensuring compliance with current legislation and to ensure that the organisation fulfils its duties and responsibilities as outlined in this policy document and the supporting procedure.
- 3.1.4 **Competent Persons** – The Head of Compliance, and the Compliance Manager (Fire) shall ensure that there are suitable arrangements in place for the implementation of the Fire Safety Management Policy and related procedures, as well as overseeing the delivery of the agreed risk assessment programmes and the prioritisation and implementation of any works arising from the assessments. They are also responsible for overseeing the delivery of service, maintenance and repair programmes for all fire detection, alarms and fire-fighting equipment within property assets owned or managed by the Group.
- 3.1.5 The Group board will have overall governance responsibility for ensuring the Fire Safety Management Policy is fully implemented to ensure full compliance with the regulatory standards, legislation and approved codes of practice. As such, the board will formally approve this policy and review it periodically. The policy will be reviewed every three years thereafter (or sooner if there is a change in regulation, legislation or codes of practice).
- 3.1.6 The board will receive quarterly updates, on the implementation of the Fire Safety Management Policy and fire safety performance along with notification of any non-compliance issue which is identified. This is so they have assurance that the policy is operating effectively in practice.

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- 3.1.7 The SLT will receive reports, at least quarterly, in respect of fire safety management performance and ensure compliance is being achieved. They will also be notified of any non-compliance issue identified.
- 3.1.8 The housing teams will provide key support in gaining access to properties where access is proving difficult and use standard methods to do so. They will also facilitate the legal process to gain access as necessary.
- 3.1.9 All staff who have responsibility for or visit properties (housing officers, scheme managers, caretakers, operatives etc.) have a responsibility to notify the compliance team where circumstances have changed within a scheme/block/property, which may result in a new fire risk assessment being required.
- 3.1.10 The Development Team will have responsibility for ensuring that any new build or acquired properties are handed over in line with the Compliance Teams requirements and that all relevant compliance information is accurate and updated on the housing management system.

3.2 Competent Persons

- 3.2.1 The Group will ensure that the Compliance Manager (Fire) with lead responsibility for operational delivery is appropriately qualified holding a recognised fire safety qualification such as NEBOSH National Certificate in Fire Safety and Risk Management or equivalent. The Group will fund training as necessary so they gain this qualification and membership. If the Competent Person does not have appropriate qualifications already these should be obtained as soon as reasonable practicable.
- 3.2.2 The Compliance Manager (Fire) will ensure that only suitably competent fire risk assessors; for example certified by BAFE and on a UKAS accredited certification scheme that meets the competency criteria established by the Fire Risk Assessment Competency Council, are procured and appointed to undertake fire risk assessments.
- 3.2.3 The Compliance Manager (Fire) will check the qualifications of those carrying out this work. These checks will be undertaken as part of the procurement process and/or on an annual basis thereafter and evidenced appropriately.

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3.2.4 The Compliance Manager (Fire) will ensure that only suitably competent contractors and engineers, such as those certified by a UKAS accredited certification scheme, are procured and appointed to undertake works to fire safety equipment, systems and installations. The Compliance Manager (Fire) will check the qualifications of those carrying out this work. These checks will be undertaken as part of the procurement process and/or on an annual basis and evidenced appropriately.

4. POLICY

4.1 Obligations

- 4.1.1 The Compliance Manager (Fire) ensure that only suitably competent fire risk assessors carry out,for the purpose of identifying the general fire precautions and other measures needed to comply with the Regulatory Reform (Fire Safety) Order 2005 (FSO). Although under the FSO this requirement only applies to the common parts of non-domestic premises, in practice the responsible person will need to take into account the entire premises - including, to some extent, the units of residential accommodation (known as a Type 3 FRA).
- 4.1.2 The responsible person (the Group) implements all necessary general fire precautions and any other measures identified by a FRA.
- 4.1.3 The responsible person (the Group) puts in place a suitable system of maintenance and appoint competent persons to implement any procedures that have been adopted.
- 4.1.4 The responsible person (the Group) periodically review its FRAs in a timescale appropriate to the premises and/or the occupational fire risk level. This timescale is determined by the fire risk assessor who carries out the FRA.

4.2 Policy Statement

- 4.2.1 The Group acknowledges and accepts its responsibilities under the Regulatory Reform (Fire Safety) Order 2005 (FSO),the Fire (Scotland) Act 2005, the Fire Safety Act 2021 (England and Wales) the Building Safety Act 2022, the Fire Safety (England) Regulations 2022 and the Smoke and Carbon Monoxide Alarm (amendment) Regulations 2022.

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- 4.2.2 The evacuation strategies in place across the different Group property types will be implemented and followed as per the recommendations of the competent fire risk assessor and in consultation with relevant Group staff. Therefore the future fire safety strategy to be adopted will be confirmed on a building by building basis in accordance with the fire risk assessor's recommendation.
- 4.2.3 The Group will hold accurate and up to date records against each property it owns or manages setting out the requirements for having an FRA in place.
- 4.2.4 The Group will hold accurate and up to date records against each property it owns or manages setting out the requirements for servicing, maintenance and repair of fire prevention, detection and fire-fighting equipment. These include fire alarm systems, emergency lighting, smoke/heat detectors, hose reels, dry and wet risers, auto window/door openers, fire extinguishers, fire blankets, sprinkler systems and any other equipment relating to fire safety.
- 4.2.5 The Group will establish and manage programmes to deliver servicing and maintenance in accordance with all relevant recommendations for all fire detection, prevention and fire-fighting systems and equipment within buildings owned or managed by the organisation.
- 4.2.6 The Group will ensure that each property requiring a FRA has in place a PAS79 compliant FRA or equivalent that has been carried out by a competent fire risk assessor.
- 4.2.7 The Group will carry out an FRA programme, ensuring that all FRAs are completed, no later than the date stated in the current FRA and that this is carried out by a competent fire risk assessor (annually, 2 yearly, 3 yearly or 4 yearly, based on the risk profile of the property).
- 4.2.8 The Group will ensure that the FRA to a building is reviewed following a fire, a change in client need and/or building use, or a change in working practices that could affect fire safety, following refurbishment works to the building or if required following an independent fire safety audit and that this review is carried out by a competent fire risk assessor.
- 4.2.9 The Group will ensure that processes are in place to implement all mandatory fire precaution measures identified by FRAs.

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- 4.2.10 The Group will implement a programme of regular property inspections for all properties with an FRA in place to audit that all required management actions are taking place. These inspections will be carried out by caretakers and housing operations colleagues and be undertaken at regular intervals, with inspection records evidenced and kept against each property. In addition to this the Group will ensure regular testing of all fire alarms and emergency lighting systems.
- 4.2.11 The Group will ensure that processes are in place to record and action any 'near miss' reports with regard to fire safety. A 'near miss' is an unplanned event which does not result in an injury but had the potential to do so.
- 4.2.12 The Group will test hard-wired smoke alarms as part of the annual gas safety check visit (or at void stage). Any properties not included on the gas safety programme will have the smoke alarms tested on a separate programme.
- 4.2.13 The Group will ensure that all properties have a hard-wired smoke alarm system in accordance with BS5839-6 In some cases it may not be possible to install hard-wired detection in which case battery operated detection will be considered.
- 4.2.14 The Group will liaise with property owners/landlords of accommodation we lease or manage on their behalf to ensure that evidence of compliance is available.
- 4.2.15 The Group will ensure that all supported living scheme residents and any residents within independent living who are unable to self-evacuate a scheme/building, (regardless of the evacuation policy), will have a) Person Centred Fire Risk Assessment (PCFRA). Any employees who would be unable to self-evacuate a work premises would also require a Personal Emergency Evacuation Plan (PEEP).
- 4.2.16 The PCFRA/PEEP will be reviewed annually by a competent person, this would usually be the care provider for supported living schemes or a scheme manager for independent living schemes. The documents will be kept in the Fire Safety Log held securely on site and will be made available to the fire service in the event of an evacuation.
- 4.2.17 Where the Group have been notified that a resident within a building is storing Oxygen in their home for medical use the organisation will ensure that they have a PCFRA in place and

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that this PCFRA will be reviewed annually by a competent person.

- 4.2.18 4.2.19 The Group will have processes and controls in place to ensure that consideration is given when letting properties to the suitability of the accommodation for the prospective tenant as regards fire safety.
- 4.2.20 The Group will refer all new tenancies (general needs and independent living) and other tenants (via general information) to the Lancashire Fire and Rescue Service for a free home safety check (also known as 'Safe and well visits') where consent is given and for as long as Lancashire Fire and Rescue offer the service.
- 4.2.21 The Group will ensure that only suitably competent fire risk assessors and fire safety engineers appropriately certified for example, under BAFE and UKAS accredited certification schemes undertake FRAs or works for the organisation.
- 4.2.22 The Group will have a process in place to gain legal access should any tenant or leaseholder refuse access to carry out essential fire safety related inspection and remediation works.
- 4.2.23 In particular, the Group will have a process in place to gain legal access to properties where tenant vulnerability issues are known or identified to ensure the wellbeing of the tenant.
- 4.2.24 The Group has a Primary Authority Agreement with Lancashire Fire and Rescue and is committed to working with all relevant Fire Services to create safer places to live and work. Joint working will include sharing information, the Fire Service reviewing FRAs and providing training to Group staff. This is an additional layer of review and assurance for the Group.
- 4.2.25 The aim of the Primary Authority Agreement is for Fire and Rescue Services to develop effective partnerships with businesses to achieve national consistency in delivering fire safety enforcement advice. Lancashire Fire and Rescue are our single point of contact for fire safety regulation advice and they work with other authorities on our behalf to resolve any inconsistencies in fire related compliance advice.
- 4.2.26 The Group considers good communication essential in the safe delivery of fire safety and will therefore ensure that information about fire safety and fire prevention measures is

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available to residents and building users via leaflets and information on the organisation's website.

4.2.27 The Group will ensure that tenants (in shared houses or blocks) have online access to a summarised, tenant-friendly version of the FRA for the property they occupy, as soon as reasonably practicable, on implementation of new IT system (during 2022/23). A full version of the FRA will be made available upon request only.

4.2.28 Where appropriate any compliance risks will be considered, mitigated or removed as part of any major refurbishment works or included in new development design briefs.

4.3 Compliance Risk Assessment/Inspection Programmes

4.3.1 **Risk assessment** – The Group will establish and maintain a risk assessment for fire safety management and operations. This risk assessment will set out the organisations' key fire safety risks together with appropriate mitigations.

4.3.2 **CDM** - to comply with the requirements of the Construction, Design and Management Regulations 2015 (CDM) a Construction Phase Plan will be completed for all relevant works (see Health & Safety Policy).

4.3.3 **Fire Risk Assessments (non-domestic and other)** – the Group will complete a programme of fire risk assessments to all non-domestic (communal blocks) and 'other' properties (offices, commercial shops, depots etc.) in its management and ownership.

4.3.4 Thereafter, the Group will carry out a programme of FRA reviews ensuring that all FRAs are reviewed no later than the review date set by the FRA and that this review is carried out by a competent fire specialist (Internally or Externally as appropriate).

4.3.5 All FRAs will be Type 3 as a minimum, along with a fire door audit (100% of all communal doors and a 10% sample of the resident's front doors) unless it is deemed by the assessor that a Type 1 survey is sufficient. This sample will need to increase if issues are found on the initial sample. Type 2 and Type 4 risk assessments will only be commissioned where it is deemed appropriate for a particular property.

4.3.6 The Group will ensure that each property requiring an FRA has in place a Publicly Available Specification (PAS) 79

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compliant report and that it has been carried out by a competent fire risk assessor.

- 4.3.7 The Group will carry out a programme of servicing and maintenance, in accordance with all relevant recommendations, to all fire detection, prevention and firefighting systems and equipment within buildings owned or managed by the organisation.
- 4.3.8 **Fire Risk Assessments (Supported Living)** - the Group will complete a programme of FRAs to all supported living properties in its management and ownership. The FRA programme will be completed by competent fire risk assessors.
- 4.3.9 Thereafter, the Group will carry out a programme of FRA reviews ensuring that all FRAs are reviewed on a risk based cycle, and that this review is carried out by a competent fire risk specialist (internally externally as appropriate).
- 4.3.10 The Group will ensure that each property requiring a fire risk assessment has a fire risk assessment in place that is PAS79 compliant (Publicly Available Specification) from the British Standards Institute (BSI) and that has been carried out by a competent fire risk assessor.
- 4.3.11 The Group will carry out a programme of regular property inspections to all properties with an FRA in place to audit that all required management actions are taking place. These inspections will be undertaken at regular intervals by caretakers and housing operations colleagues and inspections records will be kept.
- 4.3.12 The Group will carry out a programme of servicing and maintenance, in accordance with all relevant recommendations, to all fire detection, prevention and firefighting systems and equipment within buildings owned or managed by the organisation.

4.4 Compliance Follow up Work

- 4.4.1 The Group will ensure that processes are in place to implement all mandatory fire precaution measures identified by FRAs. This will be done on the following timescales:
- High risk actions (A rated) – 1 month
 - Medium risk actions (B rated) – 3 months

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- Low level actions (C rated) – captured with a programme of works to be completed within a reasonable timescale
- Recommendations/point for consideration (D rated) – evidence trail to prove that the recommendations have been considered and outcomes recorded.

4.4.2 In some circumstances it will be appropriate to consider interim mitigating actions whilst A rated actions are being completed (e.g. waking watch/alternative accommodation).

4.4.3 The Group will ensure that processes are in place to implement all fire precaution measures identified by the regular property inspections carried out by caretakers and housing operations colleagues.

4.4.4 The Group will ensure there is a process in place for the management of any follow-up works required following the completion of servicing and maintenance checks to fire detection, prevention and fire-fighting systems and equipment.

4.5 Contract Management

4.5.1 Regular contract meetings will be held with all external contractors to review and monitor key performance indicators.

4.5.2 On at least an annual basis all qualifications and competencies will be reviewed (in line with those noted in section 3.2) for all areas of work they undertake on our behalf.

4.5.3 We will ensure that all external contractors are provided with up to date information relating to all relevant compliance areas.

4.6 Record Keeping

4.6.1 The Group will establish and maintain a core asset register of the communal blocks and 'other' properties that require an FRA. This register should also identify all fire safety equipment, systems and installations within each building.

4.6.2 The register shows the date of the previous and current FRA (where applicable), along with the due date of the next FRA. The register will also be used to record and track for the Group, all fire safety actions required as identified from the FRA.

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- 4.6.3 FRA inspection and re-inspection dates, FRAs and FRA actions will be electronically stored.
- 4.6.4 The Group will establish and maintain a register against each property asset of any smoke/heat detection equipment contained within domestic dwellings.
- 4.6.5 The Group will establish and maintain accurate and up to date records of all completed FRAs, FRA reviews and associated completed remedial works from these reports and keep these as per the organisation's Data Retention Policy.
- 4.6.6 The Group will establish and maintain accurate and up to date records of all completed servicing and maintenance checks on fire safety equipment, systems and installations and details of associated completed remedial works and keep these as per the organisation's Data Retention Policy.
- 4.6.7 The Group will maintain an appropriate Fire Safety Log Book and keep securely on site or held electronically, where practical, for all communal blocks, independent living, supported living schemes and 'other' properties requiring an FRA.
- 4.6.8 The Group will establish and maintain records of all fire safety related training undertaken by staff.
- 4.6.9 The Group will ensure that processes and controls are in place to provide and maintain appropriate levels of security for all fire safety related data.

5. REGULATORY STANDARDS, LEGISLATION, AND APPROVED CODES OF PRACTICE

- 5.1 **Regulatory Standards** - the application of this policy will ensure compliance with the regulatory framework and consumer standards (Home Standard) for social housing in England, which were introduced by the Regulator of Social Housing (RSH).
- 5.2 **Legislation** - the principle legislation applicable to this policy is the Regulatory Reform (Fire Safety) Order 2005 (FSO), Fire Safety Act 2021 (England and Wales), the Building Safety Act 2022, the Fire Safety (England) Regulations 2022, Smoke and Carbon Monoxide Alarm (amendment) Regulations 2022 and for Group properties located in Scotland, the Fire (Scotland) Act 2005. These regulations place a duty on the Group to take general fire precaution measures to

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ensure, as far as is reasonably practicable, the safety of the people on its premises and in the immediate vicinity. The Group is the 'responsible person' for the purposes of the legislation by virtue of the fact that its own and manage Group homes and buildings housing tenants/leaseholders through its tenancy agreement and lease obligations. The principal applicable legislation for Group properties located in Scotland in the Fire (Scotland) Act 2005 which also places fire safety obligations on the duty holder and includes a requirement to produce an FRA.

5.3 Codes of Practice - the principal codes of practice applicable to this policy are:

- LACORS - Housing - Fire Safety: Guidance on fire safety provisions for certain types of existing housing;
- HHSRS Operating Guidance - Housing Act 2004: Guidance about inspections and assessment of hazards given under Section 9;
- Department for Communities and Local Government (DCLG) - Update on Interim Mitigation Measures Required Pending Remediation of Cladding (29.09.2017);
- Fire Safety in Purpose Built Blocks of Flats (LGA)
- Practical Fire Safety Guidance for Existing Specialised Housing (Scottish Government)
- Housing Health and Safety Rating System operating guidance: Housing Act 2004
- Fire Safety Risk Assessment: Sleeping Accommodation (HM Government)
- National Fire Chief Council's Guidance (NFCC) - Fire Safety in Specialist Housing – April 2017, covers sheltered schemes, supported schemes and extra care schemes; and
- Practical Fire Safety Guidance for Existing Premises with Sleeping Accommodation 2018 – guidance for those with responsibility for ensuring fire safety in certain premises within sleeping accommodation in Scotland.

5.4 Sanctions – the Group acknowledges and accepts its responsibilities in accordance with the regulatory standards, legislation and approved codes of practice and that failure to discharge these responsibilities properly could lead to a range of sanctions including prosecution by the Health & Safety Executive under the Health & Safety at Work Act 1974, prosecution under the Corporate Manslaughter and Corporate

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Homicide Act 2007 and via a serious detriment judgement from the Regulator of Social Housing.

5.5 Tenants – the Group will use the legal remedies available within the terms of the tenancy agreement should any tenant refuse access to carry out essential fire safety related inspection and remediation works.

5.6 Leaseholders – the Group will use the legal remedies available within the terms of the lease agreement should any leaseholder or shared owner refuse permission and/or access to carry out essential fire safety related inspection and remediation works (as tested in the case Croydon Council v. Leaseholder 1st August 2014).

Additional Legislation – This fire safety policy also operates in the context of the following additional legislation:

- Housing Act 2004
- Fire (Scotland) Act 2005 and the associated Fire Safety (Scotland) Regulations 2006
- Housing Scotland Act 2006
- Building (Procedures) (Scotland) Regulations 2004 and the Building (Scotland) Act 2003
- Health and Safety at Work Act 1974
- The Management of Health and Safety at Work Regulations 1999
- Management of Houses in Multiple Occupation (England) Regulations 2006
- Licensing and Management of Houses in Multiple Occupation and Other Houses (Miscellaneous Provisions) (England) Regulations 2006
- Gas Safety (Installation and Use) Regulations 1998
- The Furniture and Furnishings (Fire Safety) Regulations 1988
- The Health and Safety (Safety Signs and Signals) Regulations 1996
- The Building Regulations 2010: Approved Document B Fire Safety
- Electrical Equipment (Safety) Regulations 2016
- Construction, Design and Management Regulations 2015
- Data Protection Act 2018
- RIDDOR 2013

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5.7 A process is in place to identify changes to regulation and legislation through the Group's compliance reporting framework. Any changes relating to this policy will be highlighted and implemented, including a review of policy and procedural documents.

This policy also links to the following Group Policies:

- Health and Safety Policy
- Data Archival, Retention and Disposal Policy

6. THIRD PARTY LANDLORDS

6.1 The Group currently leases a proportion of its premises from 3rd party landlords whereby the landlord is responsible for compliance with all statutory legislation. As a responsible landlord The Group has a duty of care to tenants in these properties therefore it is essential that we ensure these properties meet appropriate safety standards.

6.2 In order to satisfy ourselves that 3rd party landlords are fulfilling their compliance obligations, the Compliance team will monitor compliance for all these properties to ensure that they meet all relevant statutory obligation. To do this we will make enquiries with 3rd party landlords as statutory inspections reach their anniversary date.

6.3 We will ask the 3rd party for copies of certificates to be received within 30 days of the anniversary date of the activity.

6.4 All certificates will be stored on the Compliance Management System (C365Cloud).

6.5 If evidence is not provided in a timely manner and the landlord is therefore unable to comply with their obligations, The Group will collaborate with the 3rd party landlord to establish a plan in order that that the property remains compliant. This may result in the Group undertaking the inspection on the 3rd party landlord's behalf and recharging the 3rd party landlord

6.6 Performance will be reported quarterly within the compliance scorecard and also reported to Board quarterly.

6.7 Where an assessment identifies remedial actions are required we will contact the 3rd party and ask for confirmation that these actions have been completed. Email confirmation will be retained as evidence. If confirmation is not provided, this may result in the group undertaking the remedial works on the 3rd party landlord's behalf and recharging the 3rd party landlord. If the works are not covered by the lease

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agreement, then the Group will undertake the repairs as part of its obligations.

- 6.8 It is accepted that documents prepared by the superior landlord may not be the same standard as stated in the Group's policy principles. However, as long as assessments or inspections have been carried out by competent persons then it is to be considered that the inspection is suitable.

7. IMPLEMENTATION

7.1 Training

- 7.1.1 The Group will ensure that all operatives working for, or on behalf of the organisation have the relevant training required for their role.
- 7.1.2 Group staff will undertake periodic assessments of training needs and resulting programmes of internal and/or external training will be implemented via the Health & Safety team.
- 7.1.3 All staff will have an understanding of fire safety management and their roles and responsibilities in ensuring that we maintain full compliance.

7.2 Performance Reporting

- 7.2.1 Key performance indicator (KPI) measures will be established and maintained to ensure the Group is able to report on performance in relation to fire safety.
- 7.2.2 KPI measures will be produced and provided at SLT level on a monthly basis and at board level on a quarterly basis. As a minimum these KPI measures will include reporting on:

Data – the total number of:

- Properties – split by communal blocks and 'other' properties;
- Properties on the FRA programme;
- Properties not on the FRA programme;
- Compliant properties with a valid 'in date' FRA; and
- Non-compliant properties where the FRA has expired and is 'out of date';

Narrative - an explanation of the:

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- Current position;
- Corrective action, if any, required;
- Anticipated impact of any corrective actions;
- Completion of any follow-up works – number of high, medium and low risk actions – ‘completed’, ‘in time’ and ‘overdue’
- Properties which are due for a new FRA within the next 90 days. This is the early warning system.

In addition:

- Compliance with the fire safety equipment, systems and installations servicing and maintenance programme

7.2.3 The Group will carry out independent third party quality assurance audits of completed Fire Risk Assessments. This will be a 5% sample of the total number of assessments carried out. In addition 100% of all certificated actions will be checked upon receipt.

7.2.4 The Group will carry out an independent audit of fire safety at least once every two years. This audit will specifically test for compliance with regulation, legislation and approved codes of practice and identify any non-compliance issues for correction.

7.2.5 The audit will also look at and test processes to ensure that they are being adhered to and are still fit for purpose.

7.3 Non-Compliance/Escalation Process

7.3.1 Any non-compliance issue identified at an operational level will be formally reported to the Director (Property Services) in the first instance, as soon as this is identified.

7.3.2 The Director (Property Services) will agree an appropriate course of corrective action with the Head of Compliance in order to address the non-compliance issue and report details of the same to the Deputy Executive Director (or Chief Executive in their absence) within 24 hours.

7.3.3 The Deputy Executive Director or Chief Executive will ensure the Board are made aware of any non-compliance issue so they can consider the implications and take action as appropriate, including notification to the Regulator of social Housing, if necessary.

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8. CONSULTATION

8.1 Colleagues within the organisation have been consulted on this policy. Previous reviews of this policy have resulted in a series of consultation meetings with the Customer Forum, however the amendments on this review do not require an input from tenants or customers so there is no consultation required for this review.

9. REVIEW

9.1 This policy will be reviewed following the Group's standard three year timeframe or following any legislative or regulatory changes.

10. EQUALITY IMPACT ASSESSMENT

10.1 An EIA has been completed and is in place for this policy.

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Appendix 1 – Glossary of terms

BAFE	British Approvals for Fire Equipment (UK)
BSI	British Standards Institute
CDM	Construction, Design and Management Regulations 2015
FSO	Regulatory Reform (Fire Safety) Order 2005
HHSRS	Housing, Health & Safety Rating System
LACORS	Local Authority Coordinators of Regulatory Services
PAS	Publicly Available Specifications
PEEP	Personal Emergency Evacuation Plan
UKAS	United Kingdom Accreditation Service
FRA	Fire Risk Assessment

Progress Housing Group		Property Services			
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APPENDIX 2 - Types of Fire Risk Assessment

Type 1 – Common parts only (non-destructive)

A Type 1 fire risk assessment is the basic fire risk assessment required for the purpose of satisfying the RRO. Unless there is reason to suspect deficiencies in structural fire protection –such as inadequate compartmentation, or poor fire stopping – a Type 1 inspection will normally be sufficient for most blocks of purpose-built flats. Where there is doubt, it may be necessary for another type of fire risk assessment to be carried out by a specialist company.

Type 2 – Common parts only (destructive)

The Type 2 fire risk assessment covers the same areas as the Type 1, except that there is a degree of destructive inspection, carried out on a sampling basis. It is usually necessary for a contractor to be present for gaining access to the elements to be examined and making good after the inspection.

A Type 2 fire risk assessment is usually a one-off exercise, carried out only where there is good reason to suspect deficiencies that could lead to spread of fire beyond the flat of fire origin

Type 3 – Common parts and flats (non-destructive)

A Type 3 fire risk assessment includes the work involved in a Type 1 fire risk assessment, but goes beyond the scope of the RRO (though not the scope of the Housing Act). This risk assessment considers the arrangements for means of escape and fire detection within at least a sample of the flats. The inspection of any flat is non-destructive, but the fire resistance of doors to rooms will be part of the survey.

A Type 3 fire risk assessment may be appropriate for rented flats if there is reason to suspect serious risk to residents in the event of a fire in their flats. This could be due to the age of the building or because of unauthorised alterations.

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Type 4 – Common parts and flats (destructive)

A Type 4 fire risk assessment covers the same areas as the Type 3 fire risk assessment, except that there will be some destructive inspection in the common parts and in a sample of the flats. This will normally require a contractor to gain access to the elements to be examined and for making good after the inspection. This form of inspection would normally only be carried out on properties that are unoccupied (void).

The type 4 fire risk assessment will only be required in a very limited set of circumstances, such as when a new landlord takes over a block of flats in which the history is unknown, or where there is reason to suspect serious risk to residents from both a fire in their own flats and a fire in neighbours' flats.